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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,
11 Plaintiff,
12 vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S EXHIBIT X- DETAILED
BREAKDOWN AND ANALYSIS OF
EPISODE 6: SUPPORTING EVIDENCE FOR
COPYRIGHT INFRINGEMENT CASE

15 Dated this: March 04, 2025

16
17 *M.WOLSTENHOLME*
18 _____
19 [MARC WOLSTENHOLME]
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1 **I, Marc Wolstenholme, declare as follows:**

2
3 **1. Background and Introduction**

4 I am the plaintiff in this case against Riot Games, Inc., regarding copyright
5 infringement and unauthorized use of original materials derived from my manuscript
6 "Bloodborg" and related works. I submit this DETAILED BREAKDOWN AND ANALYSIS
7 OF EPISODE 6: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE
8

9 This declaration provides evidence supporting my request for damages and to
10 outline the profound and ongoing impact of the defendant's actions on the Plaintiff's brand,
11 monetary welfare, and emotional health.
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When These Walls Come Tumbling Down.

In Episode 6 of Arcane, titled "When These Walls Come Tumbling Down," the narrative delves deeper into the complexities of its characters, intertwining their pasts and present struggles. The title "When These Walls Come Tumbling Down" is highly symbolic, reflecting the emotional, political, and literal breakdowns happening throughout the episode.

Yet, this too is alleged to have been swiped from Bloodborg's use of the same. Where it is used both as a figurative expression (a metaphor) conveying a symbolic meaning, and also in a literal, tangible way, where physical actions and objects (Walls) directly come tumbling or crumbling down.

Extracts from Bloodborg,

1, "*I was wondering how fragile the bolstering beams look, like delicate little fingers, so easy to snap. If one of them beams broke, it probably wouldn't be disastrous, but if a few of them brake in close proximity, the house of cards comes tumbling down,*" said Warwick, *holding up Jade's little finger and pretending to snap it.*

'Like dominos,' said Jade yanking away her hand and giggling.

'No like a house of cards,' said Warwick.

'Same difference.'"

1 2, “Raised walkways and roads were built to lift the sinking city from the rising
2 sea. The once famed New York subway systems became a water world, a labyrinth of unstable
3 tunnels and crumbling passages.”
4

5
6 3, “Manhattan was left to crumble and sink. Ground-level became so polluted
7 that it is now uninhabitable and submerged. The people of Manhattan toppled the Super-rich and
8 tried to rebuild. They renamed it New Kowloon and tried to govern themselves, until global
9 nuclear and biochemical war sent the world into a new dark age. Lawlessness grew from the
10 chemical ashes. Insanity spread within the fumes of war. Mutation and disease plagued the
11 streets.”
12

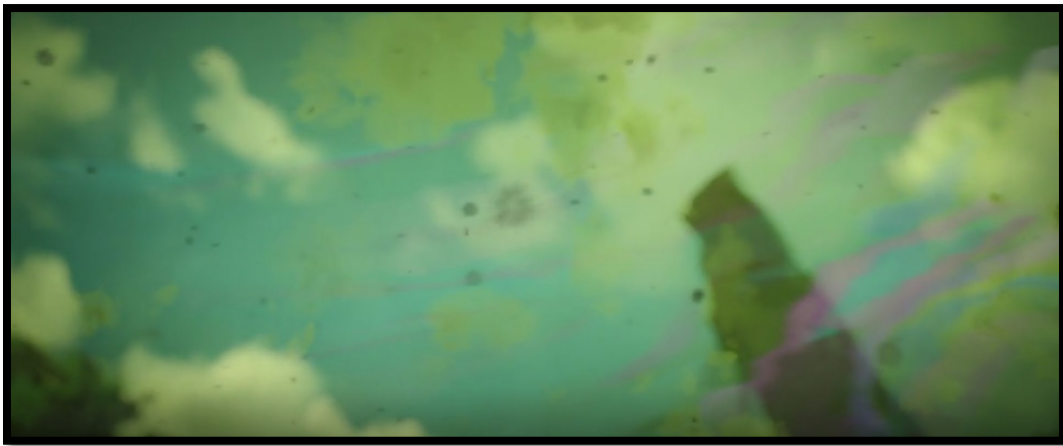
13 4, “They used sugar and bright lights and music to mask the real world, they
14 purposely deluded themselves. To Warwick, this was delusional paradise trapped between the
15 crumbling metallic walls of hell in the sky.”
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EXHIBITS

EXHIBIT A - IRIDESCENCE: A Case of Unmistakable Parallels

The opening sequence of Arcane Episode 6 introduces a striking visual: a greasy iridescent rainbow floating down a polluted stream, cascading over waterfalls, and merging into the toxic waters of Zaun. This imagery is not only vivid but plays a significant role in setting the environmental tone of Zaun- a city plagued by industrial waste, corruption, and decay.

In **Bloodborg**, similar imagery is deeply embedded within the world-building and environmental storytelling. The description of polluted waters carrying an iridescent sheen serves as both a metaphor for the planet's exploitation and a direct representation of its dystopian setting.



A1 - Iridescence in the Waters of Arcane and Bloodborg

Arcane Episode 6:

The episode begins with a slow-moving iridescent oil slick in Zaun's waterways, visually emphasizing the consequences of unchecked industrialization.

The effect mirrors real-life oil spills, where contamination creates a rainbow-like shimmer across the water's surface.

This serves as a direct visual metaphor for pollution, decay, and the exploitation of resources.

Bloodborg Excerpts:

1, *"He used the oar to shovel the little creatures off the boat and into the dark, oil-contaminated water."*

The use of "oil-contaminated water" in Bloodborg reflects the exact same industrial decay and toxic runoff present in Arcane's Zaun.

2, *"We lost connection with nature, with Gaia, we overpopulated her, we stole her energy, we cut down her lungs and polluted her waters."*

This passage establishes the loss of environmental harmony due to human greed and overexploitation, a direct thematic parallel to Zaun's poisoned state.

Comparison:

In both works, iridescent pollution serves as a visual and thematic representation of environmental degradation.

In both, industry is responsible for poisoning the water, severing humanity's connection with nature.

Both passages utilize iridescence as a marker of contamination, suggesting a shared aesthetic and narrative device that extends beyond coincidence.



A2 - Iridescence Flowing Under a Boat: A Direct Visual Parallel

Arcane Scene:

Young Viktor, as a child, builds a small wooden boat and gently places it into the polluted iridescent waters of Zaun.

As it drifts downstream, the rainbow sheen of oil and toxins flows beneath it, carrying the boat along.

The moment is symbolic: Viktor, an innocent child, is already surrounded by toxicity- both literal and figurative- foreshadowing his future struggles with morality, science, and survival.

Bloodborg Excerpt:

“A greasy iridescent rainbow floated under the boat.”

The exact same visual description is used in Bloodborg, with an iridescent rainbow flowing under a boat in a contaminated body of water.

The oil-slick aesthetic and movement of iridescent waters beneath a vessel is uniquely specific and not a standard trope.

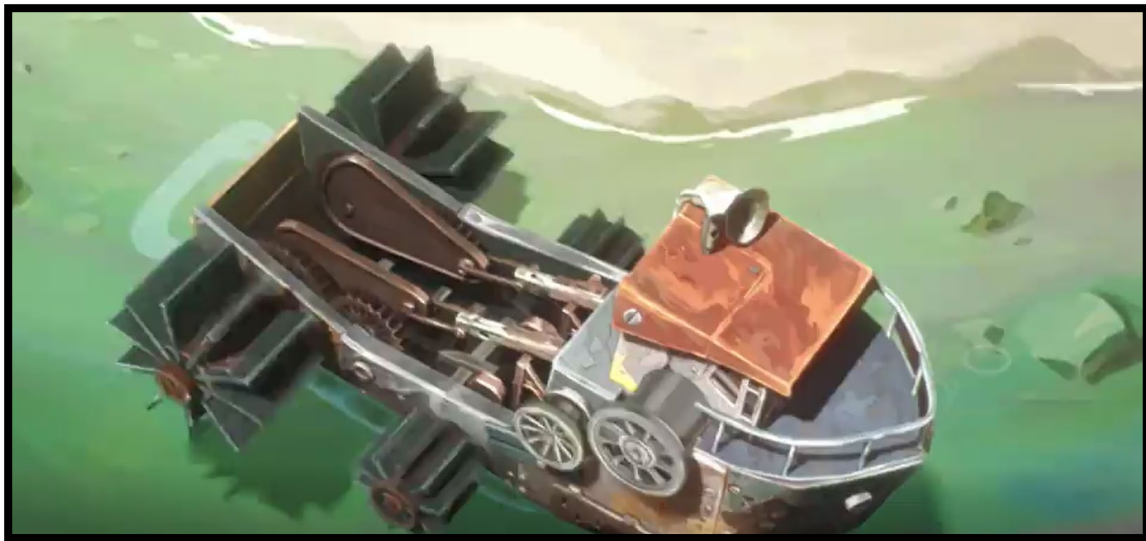
This passage serves the same narrative function in Bloodborg as in Arcane, showing environmental collapse through subtle, haunting imagery.

Comparison:

Both feature a boat in polluted waters, floating above a greasy iridescent rainbow of contamination.

Both use childhood innocence contrasted against a toxic environment as a literary and visual device.

The exact phrasing of "a greasy iridescent rainbow floated under the boat" appearing in both works raises a substantial likelihood of deliberate copying rather than coincidence.



**LEGAL ARGUMENT: STRIKING SIMILARITIES AND INFERENCE OF
COPYING**

1. The Unique Use of Iridescent Water in a Dystopian Setting

Iridescence in polluted water is not a generic trope in storytelling but rather a specific and deliberate visual motif.

While pollution and industrial decay are common themes in dystopian fiction, the unique combination of:

A rainbow-colored sheen in toxic water

The water flowing beneath a boat in a slow, haunting way

creates an extremely specific sequence that appears in both Bloodborg and Arcane.

2. Independent Creation is Statistically Improbable

Given the sheer volume of other identical themes, characters, and plot structures lifted from Bloodborg, this adds to the cumulative case that Arcane borrowed extensively from Bloodborg.

Courts have found that when multiple highly specific similarities occur across various aspects of a work (setting, themes, visual elements, phrasing), independent creation

1 becomes statistically improbable (see *Sheldon v. Metro-Goldwyn Pictures Corp.*, 81 F.2d 49 (2d
2 Cir. 1936)).

3 3. The “Total Concept and Feel” Test
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6 The “total concept and feel” of these two works, particularly in the way they
7 depict pollution, dystopian environmental decay, and the loss of innocence, makes it highly
8 unlikely that these elements were independently conceived.
9

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11 Under *Fisher v. Dees*, 794 F.2d 432 (9th Cir. 1986), substantial similarity is
12 determined not just by isolated comparisons, but by the overall mood, style, and sequencing of
13 events- all of which strongly align in this case.
14

15 4. Evidence of Access and Intentional Borrowing
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18 Riot Games had access to Bloodborg through multiple avenues, including
19 submission portals and industry agents, making the possibility of subconscious and deliberate
20 copying highly likely.
21

22 The pattern of repeated similarities across multiple elements of Arcane suggests
23 intentional rather than incidental borrowing.
24

1 If Riot Games had merely been inspired by the themes of environmental
2 destruction, they would not have recreated exact phrasing, sequences, and specific aesthetic
3 details from Bloodborg.
4

5 6 **CONCLUSION**

7 The iridescent water scene in Arcane Episode 6 bears an undeniable resemblance
8 to Bloodborg, both in visual representation and narrative function. The same environmental
9 storytelling device- oil-slicked, rainbow-colored water flowing beneath a boat- appears in both
10 works with remarkable precision. Given the non-generic nature of this imagery and the repeated
11 thematic overlaps between Bloodborg and Arcane, this strongly supports the Plaintiff's claim of
12 copyright infringement.
13

14
15 Under existing copyright law, substantial similarity need not require verbatim
16 copying but rather a recognizable appropriation of distinctive elements. The iridescent water
17 scene is one of many striking similarities demonstrating that Arcane did not emerge
18 independently but was built upon foundational elements taken from Bloodborg.
19

20
21 This further discredits Riot Games' defense of independent creation, as the
22 probability of such detailed, unique overlaps occurring coincidentally is vanishingly small.
23
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Exhibit B- Shimmer flowers and Rio - Singed's Mutated Creature



B1- Rio

Rio is the strange, mutated creature seen in Singed's laboratory in Arcane, first appearing in Episode 6. This rare mutation plays a crucial role in Singed's Shimmer experiments. It is kept alive but in poor health, because Singed is deliberately experimenting on it.

Rio's Role in Singed's Experiments

Singed is using Rio's blood to experiment with Shimmer flowers, likely testing how it interacts with organic tissue and mutations.

Shimmer is known to cause extreme physical changes, and Rio might have been exposed to it for prolonged periods, resulting in its unique physiology.

Singed harvests Rio's blood, possibly believing that its regenerative or mutative properties can be used to enhance other beings.

Connection to Viktor's Transformation

Viktor visits Singed, desperate for a cure for his degenerative condition.

Singed extracts blood from Rio and gives it to Viktor, implying that the mutated creature's biology holds the key to survival and enhancement.

After exposure to Rio's mutation-enhanced Shimmer, Viktor begins his transformation, gaining increased strength and abilities.

Scientific Ethics & Morality

Rio represents the cost of progress, as Singed is willing to torture and experiment on living beings for his research.

This mirrors Zaun's unchecked experimentation and the pursuit of scientific advancements at any cost.

Survival & Evolution

Rio's ability to mutate and survive harsh conditions may symbolize Viktor's own struggle for survival.

Just as Rio has been altered beyond recognition, so too is Viktor's humanity slowly slipping away.

Ties to Singed's Broader Experiments

Singed is known in League of Legends lore for creating monstrous experiments.

Rio may be one of many creatures Singed has altered, hinting at further Shimmer-powered mutations in Arcane Season 2, culminating in the creation of Bloodborgs.

Rio's mutations influence future creations, foreshadowing Singed's later work on Warwick.

Rio is a semi-naturally occurring rare species, meaning that Singed is hunting rare lifeforms for their blood and for experimentation.

Rio Conclusion: The Importance of Rio in Arcane

Rio is not just a mutated animal- it is a key piece in Singed's dangerous scientific advancements.

Its blood plays a direct role in Viktor's transformation, marking a turning point in his character arc.

Rio foreshadows Singed's future experiments, hinting at the creation of Warwick or other blood engineered and chemically altered beings, and ultimately Bloodborgs.

Rio was fed the shimmer flowers and experimented on, then his blood was harvested, this began the process of Blood engineering which eventually culminates in God like Bloodborg Viktor and Bloodborg Warwick. Viktor's Bloodborg cult followers are a one-world slave machine, all hooked up to his higher consciousness control.

**Exhibit B2 - Shimmer and Rio vs. Blood Harvesting & Genetic Engineering
in Bloodborg**

The concept of mutating organic lifeforms through blood-based engineering is a critical narrative theme in both Arcane and Bloodborg. In Arcane, Rio is a rare, semi-naturally occurring creature experimented upon, mutated, and ultimately drained of its blood to fuel Shimmer-based transformations. His suffering, forced mutations, and eventual exploitation mirror the blood-harvesting, human experimentation, and cybernetic augmentation in Bloodborg.

Both stories explore the dark implications of using biological resources to push scientific and genetic evolution, with an overwhelming emphasis on blood as the conduit for power, immortality, and forced transformation.

1. The Use of Blood as a Mutagen for Augmentation

In Arcane, Singed harvests Rio's blood for genetic experimentation, testing how Shimmer-infused biological material interacts with life. This blood directly enhances Viktor, marking the start of his irreversible transformation into a superhuman bio-engineered entity.

Similarly, in Bloodborg, blood harvesting is central to the dystopian power structure, with the elite exploiting blood as the key to forced evolution, genetic supremacy, and longevity.

Comparative Passages:

Arcane - Blood as a Key to Evolution

Singed extracts blood from Rio, believing that it holds the key to unlocking mutative properties for enhanced strength, regenerative capabilities, and physical augmentation.

Viktor, desperate for survival, injects himself with Rio's blood, which initiates his transformation beyond human limitations.

The experiments on Rio foreshadow Warwick's later transformation, another character altered beyond recognition through blood-infused biochemistry.

Bloodborg - Blood Harvesting & Forced Evolution

"The Founding Families, supposedly, with the help of their higher consciousness buddies, have found the Elixir of Life, a cure-all potion. I do not believe it myself. I do not believe any of their nonsense. What I do know is, they are farming us. We are a stockpile of fresh blood to them." (Blood as a central, harvested resource for forced evolution.)

"The Founding Families are moving towards a world without resistance, a one-world slave machine where the only survivors see them as gods. They plan to re-house their minds in Bloodborgs." (Parallel to Viktor's god-like transformation and control over bio-engineered humans.)

1 *“If your blood type or genetic indicators are requested; the Hunters will come*
2 *hunting, killing you for your blood.”* (Mirrors Singed’s search for rare lifeforms like Rio, which
3 he hunts, captures, and experiments upon, then later he does the same with wolves, then people)
4

5 Both Arcane and Bloodborg depict blood not as a mere bodily fluid but as a
6 critical resource- a highly sought-after material necessary for the advancement of power-hungry
7 factions.
8

9 **2. The Role of Science in Ethical Atrocities**

10 Both Singed (Arcane) and the Founding Families (Bloodborg) push the
11 boundaries of science into the realm of forced mutation and body horror, justified in the name of
12 progress, control, and the pursuit of immortality.
13

14 **In Arcane**, Singed destroys Rio’s natural state by subjecting him to chemical
15 treatments and harvesting his blood, without care for suffering or long-term consequences.
16
17

18 **In Bloodborg**, the Founding Families mass-harvest human blood, draining the
19 population for genetic enhancement experiments, ultimately to achieve cybernetic immortality.
20
21

Comparative Passages:

Arcane - Singed's Justification for Atrocities

"The key to power is understanding the building blocks of life itself." (Singed views Rio's suffering as a necessary sacrifice for progress.)

"Pain is the price of evolution." (Echoes the Founding Families' ideology of forced augmentation at any cost.)

Bloodborg - The Founding Families' Justification for Human Experimentation

"They plan to re-house their minds in Bloodborgs, the pinnacle of all creation. The ultimate cybernetic human beings." (Direct parallel to Viktor's transformation into a cybernetic, blood-infused entity.)

"Merging AI, in-brain, robotics and synthetic human self-regenerating tissue with the perfect cocktail of endless blood to be immune to all diseases and aging." (Both narratives feature a faction using bio-enhanced immortality through forced human evolution.)

Both stories explore how scientific breakthroughs are manipulated for power, often disregarding morality, ethics, or the suffering of test subjects in the pursuit of genetic superiority.

1 **4. Legal Argument: Substantial Similarity and Copying of Unique Narrative**

2 **Structures**

3 The combination of blood-based genetic enhancements, scientific
4 experimentation, and forced human evolution in Arcane and Bloodborg is not a generic trope, it
5 is a highly specific, detailed, and thematically central part of both works. The detailed
6 comparisons of Rio and blood-harvested beings in Bloodborg provide overwhelming evidence of
7 narrative appropriation of the concept of Bloodborgs, which is a copyrighted concept.
8

9
10 **Key Legal Points:**

11 Specificity of Concept-

12 Blood harvesting from rare, semi-natural lifeforms for forced human
13 augmentation is not a standard trope in fantasy or science fiction.
14

15 The detailed parallels in execution, including suffering test subjects, rare genetic
16 properties, and blood as the key to evolution, suggest direct borrowing rather than mere
17 inspiration.
18

19 Substantial Similarity -

20 Arcane and Bloodborg both depict blood as the essential ingredient for forced
21 transformation, and the suffering of rare biological creatures as a necessary step toward
22 evolution. The transformation of Viktor aligns too closely with the copyrighted Bloodborg
23 process of creating cybernetic, blood-infused superhumans.
24

1 Intent and Prior Access

2 Riot Games had access to Bloodborg's content prior to Arcane's development,
3 and the presence of these highly specific concepts in Arcane strongly suggests that Rio, Viktor,
4 and the Shimmer transformations are adaptations of Bloodborg's blood-harvesting themes.
5

6 The presence of multiple overlapping elements suggests deliberate adaptation
7 rather than independent creation.
8

9 **Conclusion**

10 The blood-based experimentation and forced mutation narratives present in
11 Arcane bear too many detailed similarities to Bloodborg to be coincidental. The themes of using
12 rare creatures for biological evolution, the ethics of scientific experimentation, and the
13 transformation of humans into immortal blood-powered beings are highly specific narrative
14 components that exist in both stories.
15

16
17 This reinforces the Plaintiff's claim that Riot Games borrowed elements from
18 Bloodborg, particularly in the development of bloodborgs, blood engineering, accelerated
19 evolution, Viktor's transformation, and the use of blood engineering as a means of power and
20 control. The legal precedent of substantial similarity and access to preexisting copyrighted
21 material strongly suggests that Arcane utilized concepts directly from Bloodborg in the creation
22 of its own bio-horror and scientific evolution arcs.
23
24

**Exhibit B3 – Shimmer Flowers: The Catalyst of Mutation in Arcane vs.
Bloodborg**

Introduction

The theme of natural substances triggering biological evolution and mutation is central in both Arcane and Bloodborg. In both works, plants, fungi, and naturally occurring elements serve as the first catalyst for biological mutation, leading to groundbreaking discoveries in genetic transformation, blood-based engineering, and enhanced evolution.

This idea is not merely a common trope but a specific narrative device that functions identically in both stories- beginning with an organic, natural source that mutates and is later synthesized into a controllable form of augmentation through experimentation.

While Arcane leaves this concept vague and undeveloped, Bloodborg explores it in a highly scientific and structured manner, touching on epigenetics, quantum mechanics, speculative environmental science, hematology, and epidemiology. The detailed approach in Bloodborg suggests that Arcane borrowed the core concept but failed to fully grasp its scientific depth, leading to inconsistencies and underdeveloped plot points in Season 2.

1. The Role of Shimmer Flowers in Arcane

A. Natural Origin & Mutation

In Arcane, Shimmer flowers are shown in Singed’s laboratory, glowing with a distinct purple hue- the color associated with Shimmer.

These plants originated in Zaun's underground caverns, where exposure to industrial toxins caused them to mutate into something with alchemical properties.

Over time, Singed harvested and cultivated them, enhancing their potency and integrating them into his biological mutation research.

B. Biological Engineering & Blood Mutations

The flowers' extracted essence is used to sustain Rio, the mutated creature.

Singed uses the flowers to refine Shimmer, enhancing its mutagenic effects.

Eventually, the Shimmer-infused blood from Rio is administered to Warwick, then later, Viktor, initiating his post-human transformation.

C. Scientific Ethics & Exploitation

The consumption and manipulation of Shimmer flowers represent Zaun's reckless scientific pursuit of progress.

They mirror real-world ethical dilemmas in genetic modification and experimental drug testing, where life is treated as a tool for advancement rather than an entity deserving of respect.

1 **2. Bloodborg's Deep-Root & Blood-Based Evolution**

2 **In Bloodborg**, a nearly identical process is described, except it is developed with
3 deep scientific reasoning, rather than being left ambiguous.
4

5 **A. Deep-Root & The Evolution of Blood Engineering**

6 The Deep-Root concoction is an ancient root-based preparation that allows
7
8 individuals to access a hidden consciousness network.

9 This is similar to Shimmer flowers but is more developed in its function, as it is
10 both a hallucinogenic enhancement and a gateway to higher understanding.
11

12 The Deep-Root system is an illegal, almost mythical interconnected thinking and
13 sharing space that was believed to have evolved naturally post-mass extinction (spoiler- it
14 didn't), functioning as a collective intelligence interface.
15

16 **Bloodborg Quote 1:**

17
18
19 *"I shall call it, if I survive and manage to get it viral on Descartes's Deep-Root.*
20 *Descartes's Deep-Root is a kind of illegal interconnected thinking and sharing space which is*
21 *thought to have developed naturally after the mass extinction, Gaia's cleansing. People still*
22 *think and share freely in Deep-Root, apparently there is much of the Old-World stuff to hack."*
23
24

Bloodborg Quote 2:

“To gain access, one must meditate for hours after taking the correct preparation drink, made from the roots of an old tree, thought to be extinct now, thus the concoction is in short supply and extremely expensive.”

Here, Bloodborg presents a clear, scientific rationale for how consuming a rare organic substance allows genetic unlocking and altered perception. Arcane borrows this idea but presents it in a surface-level way, using Shimmer flowers as a visual device without true mechanistic depth.

Extractions from Bloodborg,

Q1, *“No, I didn’t,’ said Neva, looking back over her shoulder at the empty jars of root potion.”*

Q2, *“A young boy ran over to her, from his belt, he pulled out a hunting dagger. With the blade he scraped off the slug she had just squashed. He placed the slug into an old jam jar containing several other tiny creatures, he screwed the lid back on the jar.*

‘Mama make sure you wash your hand before you eat, these slugs carry all kinds of germs and stuff, could kill ya,’ said the young boy before running off.”

Q3, “Jade looked back to the pole to see, what she supposed was rust, was an orange fungus.”

Q4, “It’s very hard to access, people say it has something to do with the Pineal gland. To gain access, one must meditate for hours after taking the correct preparation drink, made from the roots of an old tree, thought to be extinct now, thus the concoction is in short supply and extremely expensive.

I might as well admit it now, I’ve accessed Deep-Root, mostly to read of the Old-World. The Concoction (Rescogita) is more available in the 4th quarter because the mountains are harder to search.

3. The Parallels Between Blood-Based Evolution in Arcane and Bloodborg

| <i>Element</i> | <i>Arcane (Shimmer Flowers)</i> | <i>Bloodborg (Deep-Root & Blood Engineering)</i> |
|-----------------------------------|---|---|
| <i>Source</i> | Mutated plants in Zaun’s toxic underground | Extinct root-based concoction enabling epigenetic unlocking |
| <i>Mutation Process</i> | Used to sustain Rio’s biological alterations, later refined by Singed | Used to unlock higher thinking, control, and enhanced DNA coding |
| <i>Connection to Blood</i> | Shimmer-infused blood used in Viktor’s transformation | Blood harvesting and genetic selection for evolutionary enhancement |
| <i>Scientific Depth</i> | Ambiguous and undeveloped | Highly detailed in genetics, nanotechnology, and environmental mutation |
| <i>Ethical Themes</i> | Exploitation of organic matter for power | Blood harvesting and societal control through genetic engineering |

1 **4. The Legal Argument: Copyright Infringement Through Biochemical**
2 **Evolution Tropes**

3 The identical structural elements between Bloodborg and Arcane suggest that the
4 Shimmer flower concept was lifted directly from Bloodborg's Deep-Root system. While genetic
5 mutation and bio-enhancement are common sci-fi themes, the specific mechanics of:
6

7
8 A naturally occurring plant/fungal substance evolving due to environmental
9 conditions

10 Its use as the first step toward human genetic unlocking

11 It's refinement through laboratory experimentation

12 Its connection to blood-based evolution and enhancement

13 ...are uniquely developed in Bloodborg and appear in Arcane without significant
14 changes.
15

16
17 Legal Precedents Supporting Copyright Infringement in Thematic Borrowing

18 Bright Tunes Music Corp. v. Harrisongs Music, Ltd., 420 F. Supp. 177 (S.D.N.Y.
19 1976): Courts recognized that subtle replications of themes and motifs can constitute
20 infringement, even if slightly altered.
21
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1 Sheldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936): Courts held
2 that if a second work takes the "heart" of an original concept, even if details are modified,
3 infringement can still be found.
4

5
6 Kimbrough v. Sony Corp. of America, No. 08-CV-6687, 2009 WL 1716787 (C.D.
7 Cal. 2009): Establishes that even an abstract or underlying scientific principle can be protected
8 when it is distinctly presented in a narrative work.

9 Since Riot Games could not have organically arrived at this intricate concept-
10 given Bloodborg's extensive scientific development of the same idea- the presence of Shimmer
11 flowers in Arcane strongly suggests misappropriation.
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5. Conclusion: Riot Games Failed to Properly Conceal the Source of Its Ideas

The Shimmer flower mutation process in Arcane is a shallow replication of Bloodborg's Deep-Root system and blood evolution theories. Riot Games appears to have taken the central idea but failed to fully grasp or properly integrate the depth behind it, resulting in plot holes and inconsistencies.

This fits a repeated pattern of alleged deliberate copying with slight modifications to obscure direct infringement, a strategy seen in numerous past copyright disputes.

The Plaintiff has a trade secret document, "The Harvest Begins," that explains this process in greater scientific depth, which will be explored through 3 books, which he is willing to share with the Court but not with Riot Games, due to their bad-faith litigation conduct and history of misappropriation.

Thus, the inclusion of Shimmer flowers and their mutation process in Arcane is strong supporting evidence that Riot Games used Bloodborg as a source without permission, and when examined alongside other alleged stolen elements, contributes to the overwhelming case of deliberate copyright infringement.

Exhibit C- Boss wants us to grab some girls.

The character behind the bar who informs Jinx about the boss's orders to "grab some girls" is Chuck or Thieram. In this scene, Jinx addresses him as "Chuck," to which he nervously responds, "Thieram. Uh... My name's Thieram." Jinx dismisses his correction, continuing to call him "Chuck."

Thieram is portrayed as a not very bright, nervous and submissive henchman within Silco's organization. His interaction with Jinx highlights her intimidating presence and the fear she instills in those around her.



1 **In Bloodborg**, Cowboy Momahan, who Silco is alleged to have been swiped
2 from, has also sent out his men searching for a girl/ young woman, Jade.

3
4 **Bloodborg Quotes,**

5
6
7 1, *“Today’s movement reports suggest that a force of one hundred to two hundred*
8 *Feral Fighters are marching south towards the Midcity lights, they are looking for someone*
9 *close to me, they will be searching the clubs in that district, stay out of their way, they will kill as*
10 *they please.”*

11
12 2, *“Queues of clubgoers lined the way to several elevators. Gangs of men hung*
13 *around the area, peering at women, seemingly searching for someone.”*

14 3, *“The crowds moaned at the delay caused by the Feral Fighters searching some*
15 *of the women.”*

16
17 Whilst this is not the most original trope, or plot beat, it serves to show that every
18 major event in Arcane is steeped in Bloodborg, drenched in its narratives, and sticking of
19 infringements.

Conclusion - Exhibit C: "Boss Wants Us to Grab Some Girls"

The scene in Arcane where Thieram nervously informs Jinx of the boss's orders to "grab some girls" bears strong thematic and narrative parallels to Bloodborg, where Cowboy Momahan's men are similarly dispatched to search clubs for Jade.

While searching for individuals is a recognizable trope, the specific execution, structure, and contextual framing in Arcane align closely with Bloodborg- particularly in the way an organized criminal faction conducts a targeted search for a female character in a club setting and dystopian smog infested setting.

The portrayal of subservient, nervous henchmen following the orders of a dominant and feared superior is another shared element. Chuck/Thieram in Arcane and the Feral Fighters in Bloodborg serve nearly identical functions, both advancing a larger plot in which a powerful figure manipulates those beneath them to carry out a calculated search.

Given the cumulative pattern of substantial similarities between Arcane and Bloodborg, this is yet another instance where Riot Games appears to have replicated key narrative beats from Bloodborg rather than developing them organically. While isolated similarities might be coincidental, the consistent replication of Bloodborg's major plot structures, character dynamics, and thematic beats makes independent creation an increasingly implausible defense.

Exhibit D- Into the eyes of the beast

D1- In Bloodborg, Eye iconography is deeply embedded into the story. We also see the same Eye iconography represented in Arcane, without any deep insight or explanation.

In Bloodborg, Bluebeam technology quantum entangles photons. Once they are entangled, the light is inverted, literally inverting the fabric of space time. It is tied to the IO-CU which is a real-life scientific theory of consciousness and the universe. If you invert one, it becomes the other, and vice versa. This is tied to the eye iconology and so on, which has all been swiped for Arcane.

Arcane, in this scene we see an injured Vi - stabbed in the belly- helped by Caitlyn, fleeing, chased by Silco's goons, heading towards a rickety building with a massive purple eye tube lighting sign on the front of it. They jump deep into the smog-filled undercity.



1 **In Bloodborg**, the chapter when they bring a building down like this is called:
2 *Into the eyes of the beast.*

3 In this chapter, Rook is chased by the feral fighters, a jack pod reads her eyes, she
4 runs and climbs Tower Block Acme to a purple neon lit rooftop night club, the tower is partly
5 blown-up bringing half of it down, Rook encounters a blood-drug controlled Cyborg.
6

7
8 *“The elevator door opened with a bing; Warwick crumpled his nose on seeing the*
9 *interior walls of the elevator, decorated with burgundy velvet fabric and a dark purple neon*
10 *light.”*
11

12
13 **D2- Shimmer Mutants with Sensory Sensitivities.**

14
15 **After a Scene Brake-**

16 Their path leads them to a dilapidated building marked by a prominent purple
17 neon eye sign- a symbol that has sparked discussions among fans regarding its significance.
18 Seeking refuge, they descend into the smog-laden depths of the Undercity, underscoring the stark
19 contrast between Piltover's gleaming towers and Zaun's gritty underbelly.
20

21 The large purple neon eye sign adorning the building represents a location
22 associated with Shimmer addicts or a safehouse for those evading authority, like a crack den.
23

1 However, the series does not provide an explicit explanation for this symbol, leaving its meaning
2 open to interpretation. The building used to be Vi and Powder's home.

3 The descent into the smog-filled Undercity not only serves as a physical escape
4 but also symbolizes a deeper immersion into the complexities and moral ambiguities of Zaun.
5 The oppressive environment reflects the challenges and adversities the characters must confront,
6 further enriching the narrative's thematic depth.
7

8 This sequence encapsulates the series' ability to intertwine character development
9 with environmental storytelling, offering viewers a nuanced portrayal of resilience, alliance, and
10 the multifaceted nature of the world within Arcane. It is alleged that this too is taken from
11 Bloodborg.
12

13 Caitlyn helps Vi up off the ground. We see Shimmer and chemical mutants
14 everywhere. Rats scurry around, a mutant bites into a dead rat.

15 Caitlyn asks, "What is this place?"

16 Vi says, *"It's the kinda place where the people you topsiders don't want to think*
17 *about wind up."*
18

19 We hear a mutant grunting and holding out his hands, begging.

20 Caitlyn shines a flashlight onto the mutant, he grunts and retreats covering his
21 face with his hand and he runs away.
22

23 A second mutant is harmed by the flashlight, confirming that the mutants are
24 sensitive to light.

1 We see that the mutated have sores, raw skin and blisters.

2 We see Huck the traitor is now a shimmer addict, on his way to mutating.

3
4 **In Bloodborg,**

5
6
7 1, *“The closer eyes hid amongst the floating rubbish and rubble, expanding,*
8 *illuminating the darkened corners from which they inhabited.”*

9 2, *“Severely mutated beings scrambled on four rotting limbs to the edges of the*
10 *rubble. Some had holes where their eyes once were, others had rotting eyeballs with maggots*
11 *dripping out. An army of flies followed forward, buzzing around their heads. A gang of rats*
12 *nibbled away at their rotting limbs. They pointed their noses, some up in the smog and others*
13 *bowing their heads to the river, trying to pick up the moving scent of blood. Warwick looked*
14 *down at the sandbags between his feet, blood had soaked through the bags onto the floor of the*
15 *boat and leaked into the water.”*
16
17

18
19 **In Josh’s diary entry in Bloodborg,** he lists some of the mutated and diseased
20 people. He calls the list, *“Gangs beyond the wall, Nullifidian and all.”*
21
22
23
24

Bloodborg quote from this list,

*“The Diseased/ Infected - Badly mutated and contagious, often have large open
pus-filled sores and blisters, or are wrapped up in rags to hide the sores.*

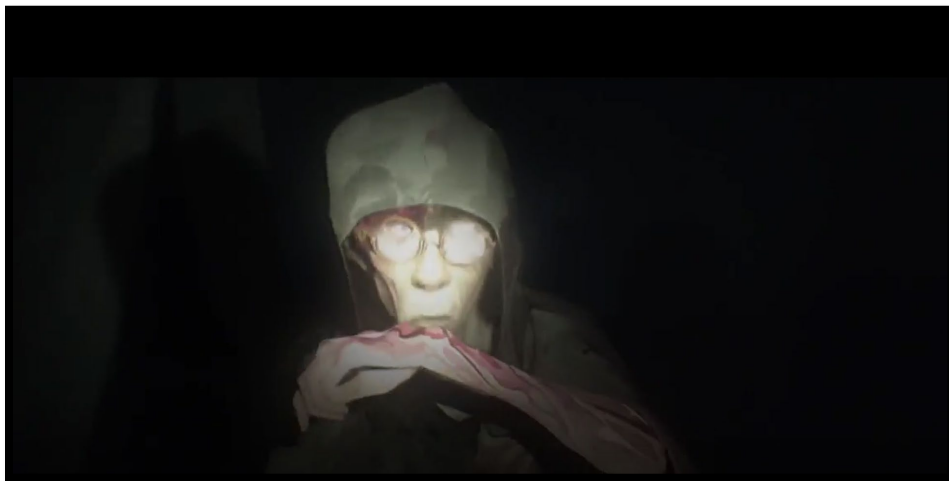
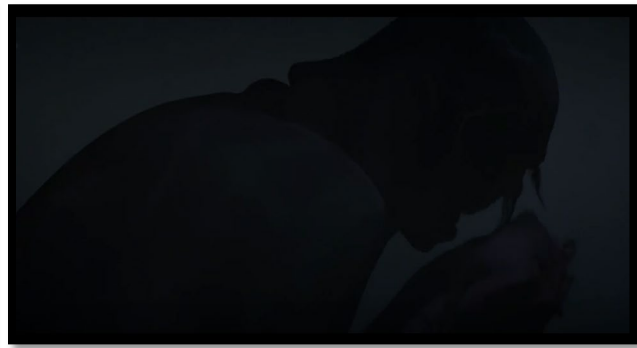
*The Unwell- translucent skin or very pale. They cover up in sunlight to protect
their skin, often live underground or in caves, they move around, scavenging and foraging
mostly at night.”*

In Warwick’s POV,

1, *“‘Just keep rowing gently and be silent,’ said Warwick, knowing that noise and
movement and even light overloads the damaged brains of the infected and the mutated, sending
them into a rage.”*

2, *“His body tickled with rage. Not like the blind rage of the mutated, more of an
emotionally charged rage of a damaged man.”*





D3- A Friend Mutated

Down in the Smog-filled underbelly, we see Huck, the guy who was trading in the bar in the Lanes, who Vander helped in episode 1. Huck is now a shimmer addict and well on his way to being a mutant. Huck has a mutation growth on his forehead. He takes Caitlyn to a mutated “Witch Doctor” who makes potions. Caitlyn Trade’s her rifle for a healing shimmer potion for Vi. Huck does not want Vi to see him in his muted state.

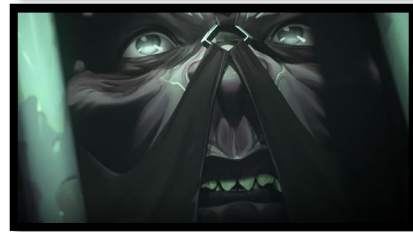
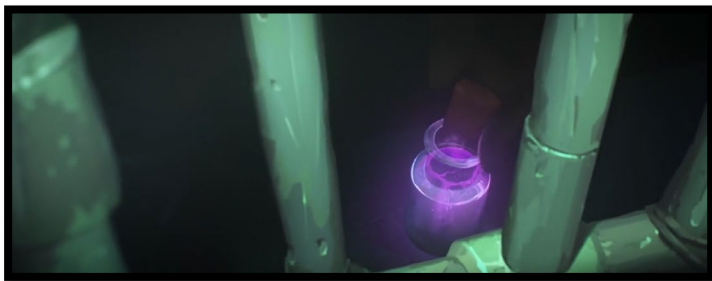
This shows us,

A, Vander (Bloodborg’s Warwick) once helped this mutated man.

B, The side effects of Shimmer (Blood-drugs) is / are multifaceted.

C, Shimmer can be used in many forms, including healing.

D, People trade with the mutated.



In Bloodborg,

A, *“The leader of the gang stood at the front, with his head covered in blood and pus saturated rags. He looked Warwick in the eyes and winked. Warwick bowed his head, then lifted it and winked back. He gave out a sorrowful sigh and handed the leader the sandbag as they floated passed the platform. The two of them lingered onto the hold before Warwick released his grip. The leader of the gang dropped a tear and looked away.*

‘John,’ Warwick whispered, back over his shoulder as they floated on. The leader looked back at the boat, moving to the corner of the platform. Warwick tossed a pack of cigarettes over his shoulder. John caught them.”

B1, *“The instant side effects are quite pleasant, normally a warm and tingly feeling inside. But the aftereffects are really quite horrible, I’ll be twitching all day tomorrow.”*

B2 *“I grew very aroused; it must have been the side effects of the DASRI.”*

C1, *“It’s kinda soothing, like DASRI injections, without the arousing side effects. I guess it helps to write, like self-healing or something.”*

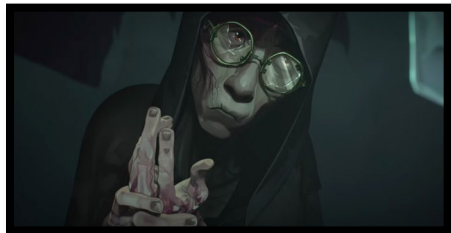
C2, *“The wounds on her back began healing instantly.”*

1 D1, *“Tinkers and Traders – Hang around the wall doing deals, they loot from the*
2 *dead bodies of the Nullifidian. They also steal the Nullifidian corpses, they cart corpses off, but*
3 *no one knows what they do with them.”*
4

5
6 D2, *“Those that are immune or have managed to not come in contact with the*
7 *infected, live on up in New Kowloon without a care in the world for us. They don’t help us, trade*
8 *with us, or even acknowledge that we exist, they trap us down here in the smog. They built the*
9 *raised streets, closing off our sunlight, they drop their rubbish on us, they shoot us on sight.*
10 *Warwick is different, he trades, he helps and talks to us, he delivers messages to our loved ones*
11 *back up in New Kowloon.”*
12
13

14 **Huck’s forehead mutation in Bloodborg,**

15 *“Many have pronounced foreheads and raised eyebrows.”*
16



After a Scene Brake-

D4- The Melody of the Damned

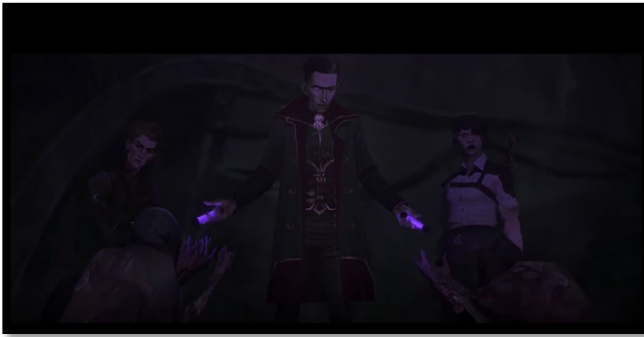
Caitlyn heals Vi with the Shimmer potion. We see the childhood drawings of Powder; Caitlyn figures out that this was Vi's childhood home. They hear howling of the mutants, which is called *The Melody of the Damned*, in Bloodborg.

"The smog was dense, trapped between the raised platform streets far above and the black water below. Creatures slithered around in the seawater. Green eyes glared from the surrounding buildings. Deep groans and distressing screams echoed through the smog. In the streets above these sounds are known as The Melody of the Damned, which was graffitied on the Buildings before they entered the cave-like undercity."

D5- Huck betrays Vi to Silco

They go outside, Silco is out there giving Shimmer to the mutants. Vi sees Silco handing a vile of shimmer to Huck. Huck betrayed them, showing the devastating effects that Shimmer (Blood-drug) addiction has on morals and values. Kind of like Marvin's betrayal in Bloodborg,

'You sold me out to the Monroe Hunters.'

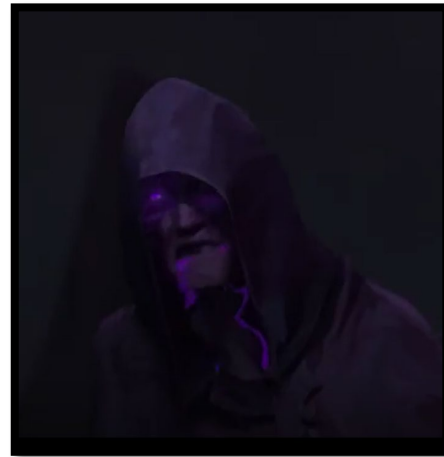


D6- Shimmer Super strong monsters.

Silco gives unadulterated or stabilized Shimmer to addicts. They terraform into Shimmer Super strong monsters.

In Bloodbong,

“... many have physical mutations, most notably the size of them, they are huge, both tall and wide in comparison to humans.”



D7- Bring down The Building

Vi punches the rickety wooden scaffolding of the glowing purple eye sign, causing the building to collapse on Silco and the Shimmer mutants. Silco braces for impact but the pupil falls on him and leaves him relatively unharmed, as he goes through the hole in the eye.

Did I mention that the corresponding chapter of Bloodborne I which they bring down a building is called, **“Into the eyes of the beast”**



D8- Purple Eye

Purple eye aesthetic in Bloodborg,

1, *“The smog began to energise- swirling up into the sky and dissipating into a gooey purple and blue rain.”*

2, *“The sphere grew, showering itself with blue, green, yellow and purple branches, like a vibrant iris. The iris looped in on itself, rotating inwards. A blackness opened from the centre of the sphere, an awoken pupil.”*



**Comparison, Conclusion, and Legal Argument - Exhibit D: Into the Eyes of
the Beast.**

Comparison Between Bloodborg and Arcane

Both Bloodborg and Arcane heavily incorporate eye iconography, mutant transformations, and a descent into the dystopian underworld, but Bloodborg provides deep scientific and philosophical underpinnings, whereas Arcane presents them with little explanation or depth.

Eye Symbolism & Quantum Concepts

In Bloodborg, eye iconography is tied to Bluebeam technology, quantum mechanics, and IO-CU theories of consciousness, where the inversion of photons manipulates space-time and perception.

In Arcane, we see a giant purple eye sign on a building with no explanation, where Vi and Caitlyn flee into the smog-filled undercity, mirroring Rook's escape into a neon-lit rooftop club in Bloodborg.

Bloodborg even has a chapter titled "Into the Eyes of the Beast", aligning with this Arcane scene.

Mutants & Light Sensitivity

Arcane's Shimmer mutants display light sensitivity, sores, and severe mutations.

In Bloodborg, the Diseased and Infected exhibit mutated, pus-filled sores and raw skin, and light, sound, and movement trigger their aggression, paralleling Arcane's depiction of mutants.

The Betrayal of a Former Ally

In Arcane, Huck, previously helped by Vander (Warwick in Bloodborg), falls to addiction and betrays Vi and Caitlyn to Silco.

In Bloodborg, Warwick is betrayed by Marvin, a former ally whose morality is compromised by external forces, aligning with Huck's arc.

Bringing Down the Building

Arcane's scene ends with Vi punching down the rickety wooden scaffolding of the purple eye sign, collapsing the structure on Silco and his mutants.

In Bloodborg, Rook's escape leads to a rooftop nightclub collapsing during a battle against a blood-drug-controlled cyborg- in a chapter titled "Into the Eyes of the Beast."

1 *The Melody of the Damned*

2
3 **In Arcane**, eerie mutant howls echo through the undercity.

4
5 **In Bloodborg**, Warwick describes an identical auditory phenomenon, "The
6 Melody of the Damned," graffiti-tagged onto buildings in the underground slums.

7
8
9 **Conclusion**

10 The cumulative replication of themes, plot structures, and worldbuilding elements
11 in Arcane strongly aligns with Bloodborg. While some tropes- mutants, betrayal, and
12 underground hideouts- are common in dystopian fiction, the specific execution, terminology, and
13 sequencing of events suggest direct appropriation rather than independent creation.
14

15
16 The use of the purple eye aesthetic, the title "Into the Eyes of the Beast," and the
17 scientific framework of consciousness and inversion in Bloodborg further erodes the plausibility
18 of coincidence. These elements are not merely similar in concept but function identically within
19 the respective narratives, reinforcing the argument that Arcane has systematically lifted core
20 components from Bloodborg while obscuring their origins.
21
22
23
24
25

Legal Argument – Copyright Infringement & Bad Faith Adaptation

Courts recognize substantial similarity not only in verbatim copying but also in the structural and thematic replication of unique creative elements (See *Sheldon v. Metro-Goldwyn Pictures Corp.*, 81 F.2d 49 (2d Cir. 1936)).

The presence of the purple eye iconography, the thematic descent into an underworld, the specific nature of Shimmer/Blood-drug mutants, and the collapse of a neon-lit structure tied to eye symbolism is not a generic trope but a highly specific, sequentially identical adaptation of Bloodborg.

The deliberate placement of eye iconography throughout Arcane without explanation, while in Bloodborg it is directly tied to advanced scientific theory, suggests a pattern of strategic appropriation meant to obscure the original source material.

If Riot Games' creative team had independently developed these concepts, they would have built an internal logic for their inclusion. Instead, they appear as unexplained artifacts—strongly indicating they were adapted without full comprehension from Bloodborg.

1 Bad faith adaptations are recognized in copyright disputes where a party modifies
2 or obfuscates source material to create legal deniability while still benefiting from the copied
3 elements (Bright Tunes Music Corp. v. Harrisongs Music, Ltd., 420 F. Supp. 177 (S.D.N.Y.
4 1976)).

5
6 Given this overwhelming evidence of structural, thematic, and even
7 terminological replication, Riot Games' argument for independent creation is further
8 undermined. The inclusion of these elements in Arcane aligns not with mere inspiration but with
9 deliberate adaptation, which constitutes copyright infringement and bad faith misappropriation of
10 creative material.

11
12
13 **Side Notes,**

- 14 1. This scene is split throughout episode 6.
15 2. The next exhibits will revisit the missed scenes from in between the scene
16 brakes.
17 3. The Wall Art in Exhibit E is from the former home of Vi and Powder,
18 which is now supported by wooden scaffolding and a purple eye.
19 4. The home of the orphans (Vi, Powder, Mylo and Clangor) in episode 1, is
20 structurally different, this is a different setting, suggesting it has been
21 reworked from the original.
22
23
24
25

The below image is Vi first vision



Warwick's Dog Jackie- his white and golden-brown Jack Russell.



55

PLAINTIFF'S EXHIBIT X- DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 6: SUPPORTING
EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 But that's just a coincidence, right? That could be anyone's yappy Jack Russell, right?

2 Expect she has an Air-blades attacking her.

3 *(Air-blade is mentioned by name 119 times in Bloodborg)*
4



How do we know it's an Air-blade?

From Bloodborg,

1, *"The explosion wasn't from D'borg's finger, this was just a party trick.*

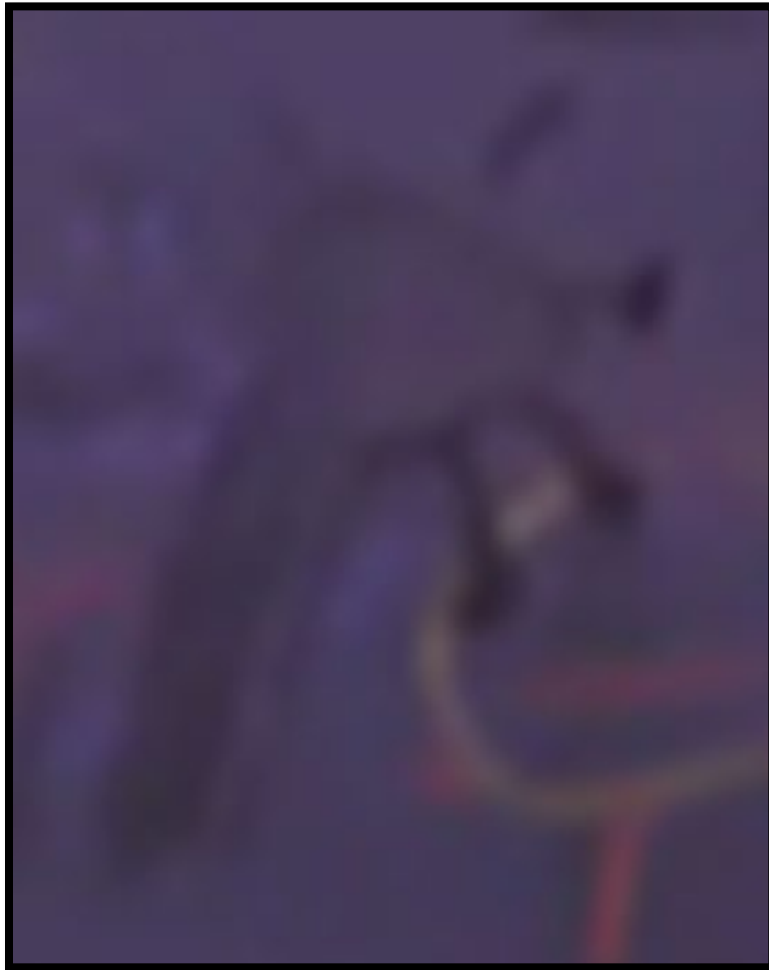
Warwick wasn't the only one with friend's in the sky. D'borg had brought allies. Her flying assistants- the Air-blades- looked more like krueger's gloves than air-support. They had four rear protruding razorblade wings, titanium plates covering the knuckle like body and a squared front screen which looked like a pair of Old-World plastic neon wrap around visor sunglasses."

2, *"The glove-like blade air-support landed by her side. It dropped two blades to the ground and stood up tall. It walked over to D'borg and scanned her damage. Sending the damage report, it signalled for assistance. Five more Air-blades landed around her broken body. With scissor arms and countless tubes, the Air-blades set to work; injecting her, cutting wires, welding parts, stopping leaks, refilling levels, burning flesh, doing all they could to repair D'borg, to get her back in the game, back on the battlefield.*

The human remaining inside the machine felt every cut, every burn, every tug of the robotic forceps of the Air-blades. Inside she screamed in agony, inside she remembered the pain of being human and she loved it, she long for the pain, just to remember how to feel.

An Air-blade hopped up onto the bonnet of the old yellow cab and laser cut a section of bonnet out. Another Air-blade flew over to what looked like an old-world green tank,

1 *buried under a mound of rusting metal. D'borg understood that she was being bodged together*
2 *with whatever the Air-blades could find- in this scrapyard spare parts were plentiful. She put*
3 *herself into trance-out mode and waited for the little flying surgical-mechanics to perform the*
4 *operations. ”*
5



1 Still a coincidence, right? Except it's not just a drone, it's an air-blade, it's a very specific design,
2 attacking a dog, flying at the dog's head. If only that were in Bloodborg!

3
4
5 **Extracts from Bloodborg,**

6 1, "*D'borg took command of the Air-blade, projecting her consciousness into it*
7 *and remotely controlling it. She called for the back-up of two more Air-blades. Waiting for them*
8 *to arrive, she flew the Air-blades around the building, mapping out all the exits and the building*
9 *3D models of the heat signals.*

10
11 *Warwick wasn't there, one of the heat signals came from a small four-legged*
12 *creature and the other from a tiny robot. She cancelled the back-up and decided to command this*
13 *Air-blade to enter the apartment. She flew the Air-blade onto the window ledge, where Warwick*
14 *and Jade had been drinking coffee just hours before. The Air-blades scanned the apartment. It*
15 *found nothing. A whimper came from deep within the ventilation shaft. The Air-blade jumped up*
16 *onto its blade limbs and crawled into the shaft like a stalking spider.*

17
18 *Following the whimper, The Air-blade crept around a corner to see a small dog.*
19 *Jackie sat at a junction of the shaft, whimpering. The Air-blades lifted a blade and prepared to*
20 *lance forward to stab the dog in the face. D'borg synthetic skin warmed with the thought of*
21 *watching Warwick's dog getting stabbed in the head."*
22
23
24
25

1 2, “‘Go girl,’ shouted Roy, from outside the shaft. Jackie ran around the corner
2 and exited the ventilation shaft into the master bedroom. Jackie turned back to the shaft hatch,
3 which was held up with a stick. She bit down on the stick and pulled it away, closing the hatch
4 down, which clipped shut. Roy lit a match and tossed it into the shaft at the other hatch.

5
6 D’borg looked down at the blade fingers of the Air-blade. It was standing in a
7 brownish liquid. The liquid erupted, setting the whole shaft on fire, the Air-blade with it. The Air-
8 blade squealed and frantically smashed around the shaft trying to put out the fire.

9
10 It turned, running towards Roy. Roy unclipped the hatch and slammed it shut. The
11 Air-blade punched through the steel rapidly. It cut its way through the hatch. Still on fire, it
12 jumped out of the shaft and lanced at Jackie, stabbing her in the belly.

13 Jackie whimpered as she fell to the ground. The Air-blade stood back up and lifted
14 a blade ready to stab down through Jackie’s head. Jackie looked up, with sadness dripping from
15 her eyes.

16
17 Roy ran over, seizing the elevated blade, he placed his feet against the visor of the
18 Air-blade and pulled backwards, the blade cut through his hand. Roy fell onto his back. Half of
19 his hand fell down next to him. The blade had nearly snapped off, it juddered around wildly as
20 the Air-blade turned to Roy. He bent both his knees and slammed both his feet into the visor head
21 of the Air-blade. The visor smashed open as the Air-blade crashed backwards against the wall.
22 Roy sprung to his feet and slammed his fist into the broken visor. He ripped out a fistful of wires,
23 the Air-blade fell to the floor in a heap, still on fire.
24

1 *Roy picked up the sweeping brush and slid the Air-blade out of the massive glass-*
2 *free window and tossed the brush out after it. Moments after the Air-blade exploded.*

3 *Roy ran back over to Jackie.*

4 *He sat down next to her and lifted her head, placing her over his legs.*

5 *'It'll be ok girl,' said Roy, hugging Jackie's head."*
6

7
8 **If you are still in any doubt, the wall art also depicts Crab-bots.**



Crab-bots in Bloodborg,

1
2
3 1, “At the foot of the stairs are enormous piles of dead Defenders, the night
4 watches fallen men. Crab-bots are picking up the corpses around the throat with their steel
5 pincers. The roots of the bots are shooting out and piercing the corpses all over, draining the
6 bodies in seconds, sucking them bone dry before tossing them into a giant grinder truck. Has
7 nobody else noticed this, are they so rage blind that they cannot see this for what it is. It’s a
8 blood bath, it’s a blood farm. It’s a bloody nightmare.”
9
10

11
12 2, “At the giant tanks of blood, Crab-bots waited to drain the blood of the poor
13 victims. The bodies were then tossed into massive grinders. The stench of blood was so strong it
14 latched onto my palate, almost as if I had bit my lip and could taste the iron. It reminded me of
15 the rusty iron bridge my father and I use to walk across on the way to hunt. The smell of wet iron
16 under the pounding rain was pleasant, unlike this smell, this iron smell of blood was unbearable,
17 it choked me.”
18

19 3, “I had been sedated, and I was very scared, you would be too if your options
20 were left to the killer crab-bots or straight forward for your blood to be sucked out of you like a
21 fucking milkshake whilst you lay watching. I’m not a fucking beverage or a log for the
22 woodchipper, I’m a human being, and I don’t like my options here.”
23
24

One big fat coincidence, right?

1, A Jack Russell (specific breed of dog).

2, An Air-blade drone

3, Said Air-blade flying at the Jack Russell

4, Crabs

5, Ella Purnell specifically mentioned “Crabby Robot things” in the Arcane

Afterglow interview.

6, Oh, and the Plaintiff’s initials, which are also his writing alias, appear to be
hidden in the wall art. Well, isn’t that a strange coincidence?



**Comparison, Conclusion, and Legal Argument – Exhibit E: Wall Art in
Arcane Directly Referencing Copyrighted Components of Bloodborg.**

Comparison Between Bloodborg and Arcane

The wall art featured in Arcane during Vi's hallucination scene contains direct visual references to highly specific copyrighted elements from Bloodborg. These elements- such as Warwick's Jack Russell terrier, Air-blades (intelligent attack drones), and Crab-bots (advanced killing machines that harvest blood)- are not only unique but also serve crucial narrative and thematic functions in Bloodborg, making their sudden appearance in Arcane highly suspect.

Jack Russell Terrier & The Air-Blade Drone Attack

Arcane's wall art features a Jack Russell terrier being attacked by an airborne drone- a highly specific and unusual image that aligns precisely with a key scene in Bloodborg where Warwick's dog Jackie is nearly killed by an Air-blade drone.

The Air-blades are unique to Bloodborg, referenced over 119 times, and described in detail as quad-winged drones with surgical-like functions, exactly matching the drone depicted in Arcane's wall art.

1 **Crab-Bots & Blood Harvesting Machines**

2
3 The Crab-bots in Bloodborg are advanced mechanized units designed to drain
4 blood from corpses and process them into raw biological material- a key element in the
5 dystopian horror of the story.
6

7 Arcane includes a direct visual depiction of crab-like machines, and actress Ella
8 Purnell (Jinx's voice actress) even referred to them as "Crabby Robot Things" in an Arcane
9 promotional interview, validating their prominence within the show's design.
10

11 Bloodborg's Crab-bots serve a specific narrative function in mass-scale blood
12 harvesting, making their appearance in Arcane a strong indicator of thematic and conceptual
13 replication.
14

15 **The Alleged Use of Plaintiff's Initials (M.W.) in the Wall Art**

16
17
18 Beyond the Bloodborg-specific imagery, Arcane allegedly includes hidden initials
19 "M.W." embedded in the background of the scene, which the Plaintiff argues is a deliberate
20 taunt.
21

22 If proven, this would establish bad faith intent, indicating that Riot Games was not
23 only aware of the Plaintiff but chose to include a mocking reference within the show itself.
24

1 **Conclusion**

2 The level of specificity in the wall art- depicting a Jack Russell being attacked by
3 a uniquely designed drone, the appearance of Crab-bots, and the alleged inclusion of the
4 Plaintiff's initials- strongly suggests deliberate appropriation rather than coincidence.
5

6
7 Bloodborg is not a well-known, widely published work- meaning the presence of
8 these elements in the exact same context as they appear in Bloodborg is statistically improbable
9 without prior access.
10

11 The lack of explanation for these visual elements within Arcane further
12 strengthens the argument that they were inserted as artifacts of an uncredited adaptation, rather
13 than independently conceived ideas.
14
15
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24

Legal Argument - Copyright Infringement & Bad Faith Copying

Substantial Similarity & Unique Expression

Under copyright law, substantial similarity is determined not only by exact replication but also by the misappropriation of unique creative expressions (Sheldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936)).

Courts have ruled that highly specific and original elements, such as unique creatures, technological designs, and world-building concepts, can constitute copyright infringement (Williams v. Gaye, 895 F.3d 1106 (9th Cir. 2018)).

Bloodborg's Air-blades and Crab-bots are not common tropes; their specific function, design, and narrative integration are unique, making their uncredited inclusion in Arcane legally significant evidence of copying.

1 Hidden Acknowledgment of Copyright Infringement

2
3 Courts have recognized the inclusion of references to a source work within an
4 infringing product as evidence of prior access and copying (Bright Tunes Music Corp. v.
5 Harrisongs Music, Ltd., 420 F. Supp. 177 (S.D.N.Y. 1976)).
6

7 If Riot Games embedded the Plaintiff's initials ("M.W.") within Arcane, this
8 directly contradicts any claim of independent creation, instead demonstrating bad faith copying
9 with the intent to mock or gaslight the original creator.
10

11
12 Misappropriation of Trade Secrets & Unjust Enrichment

13
14 If Riot Games intentionally studied Bloodborg during development and used its
15 worldbuilding, technological concepts, and themes, they could be liable for misappropriation of
16 trade secrets (Silvaco Data Sys. v. Intel Corp., 184 Cal. App. 4th 210 (2010)).
17

18 Given Arcane's commercial success, Riot has financially benefited from the
19 unauthorized use of these elements, supporting a claim of unjust enrichment (Feldman v.
20 Twentieth Century Fox Film Corp., 723 F. Supp. 2d 357 (S.D.N.Y. 2010)).
21
22
23
24

1 **Final Legal Standing**

2 The direct visual replication of Bloodborg's original, copyrighted concepts in
3 Arcane supports a strong claim of copyright infringement and misappropriation of intellectual
4 property.
5

6 If Riot Games knowingly placed the Plaintiff's initials within Arcane, this
7 constitutes bad faith copying and potential intentional infliction of emotional distress (Hustler
8 Magazine, Inc. v. Falwell, 485 U.S. 46 (1988)).

9 The Plaintiff has a legal basis to demand financial restitution and an immediate
10 preservation of Riot Games' internal communications regarding Arcane's development to
11 determine the extent of the infringement.
12

13 Plaintiff asserts that Riot Games cannot claim independent creation under these
14 circumstances, and that continued denial would only serve as further bad faith delay tactics.
15
16
17
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24

Exhibit F- Jinx interrogates Sivika.

In this scene Sivika walks into Silco's office, Jinx spins around in the desk chair, it's a trap, it's too late, Sivika walks into the trip wire triggering sleeping gas. Jinx places on a gas mask. Sivika is sedated. She comes around, she's tied up. She is stabbed, slapped, abused, interrogated, and spun around by Jinx, who is toying with her.



In Bloodborg,

Marvin and his men walk into a trap. Warwick has his gas mask on. Marvin is sedated. He comes around, he's tied up. He is stabbed with darts, abused, interrogated, and spun around by Warwick, who is toying with him.

Extract from Bloodborg,

"The circle of men ran at Warwick each taking two strides before head planting the floor. The circle of men lay at his feet as Warwick glared at Marvin. Marvin dropped the wrench and pulled a handgun from his pocket.

Warwick shook his head, as Marvin pulled the trigger. The Handgun clicked but failed to fire. He pulled the trigger again and achieved nothing.

'Goodnight Marvin,' said Warwick, a few seconds before Marvin fell backwards in a pool of oil and dirt.

Marvin woke to a sharp pain in his chest. He was looking down at the ground. As he came to, he realised he was hanging upside down with his smog mask off. The doors were shut, Warwick had taped the seals of the door and turned on the extractor before taking off his own mask.

'Well If it isn't my mate Marvin The Machine, what can I do for you my old friend.'

1 *‘What’s going on, Warwick, Warwick mate... what have I done wrong.’*

2 *‘You sold me out to the Monroe Hunters.’*

3 *‘I didn’t, I wouldn’t.’*

4 *‘Marvin, they hired you to hire me to track them down and kill them so that I*
5 *would walk right into their ambush, but it didn’t quite work out that way did it Marvin, and now*
6 *they are dead and you are hanging upside down with a dart in your back and one in your chest,’*
7 *said Warwick.*

8 *Marvin looked up to see a dart hanging out of his chest. His body trembled.*
9 *Warwick threw another dart. It stabbed Marvin’s groin area and fell out, landing on the muddy*
10 *metal floor.*

11 *‘Look behind you Marvin, say hi to your friends,’ said Warwick, walking over to*
12 *Marvin and spinning him around. As he spun, he glimpsed his men, nailed to the wooden shack*
13 *walls. Marvin cried out loud and wet himself. His urine ran down his belly and chest and across*
14 *his face as he spun around looking at his mutilated friends.”*

Exhibit G- House of Cards

The next scene in Episode 6 is Silco visiting Markus's home and playing with his daughter Ren. Silco is sitting on Ren's bedroom floor, building a house of cards, pretending that everything is ok. Silco and Marcus talk about Vi and Caitlyn investigating The Lanes. Silco did not know that Marcus hid Vi in Stillwater Prison. Silco tells Marcus that Vi cannot resurface. Silco pretends to place a card on top of the house but deliberately knocks the tower down.

Silco says to Ren, "*So sorry, accidents happen.*" Then he gets up to leave.

We, the audience, understand this to be a threat, as does Marcus, but Ren doesn't as she is too young to understand. This is dramatic irony.



1 In the below extract from Bloodborg, we see the same House of Cards dramatic
2 irony and indirect threat as Warwick is still trying to “sus out” (work out) Jade’s motivations and
3 objectives. This House of Cards scene is built and delivered in the same manner, within different
4 stories.

5
6 **From Bloodborg,**

7
8 *“The elevated street platforms of Tetris were neon-bright and wild with activity.*
9 *Glass walkways with rivers of coy carp swimming under them ran down both sides of the main*
10 *gangways. Trance music fussed the air. The scent of sugar, dough and coffee lingered, invitingly.*
11 *People danced the streets placing tabs of paper on each other’s tongues. Others sat talking on*
12 *benches. Doorman ushered people into their clubs. Prostitutes of every creed and gender, every*
13 *shade and size, touted for business. The solarscape protection force patrolled the sidewalks; as*
14 *high as any of the club goers.*

15
16 *They turned onto the next block; Street vendors sold dough balls and sugar on*
17 *sticks. Tanning shops hung banners of hulking blonde bodybuilders wearing sunglasses whilst*
18 *drinking pina colada on beaches. Fake palm trees drooped on the gangway corners and a song*
19 *about Acapulco blasted from the massive speakers.*

20
21 *On the next street, women played volleyball; jumping around in skimpy bikinis in*
22 *a sandpit as floodlights beamed down on their backsides and a spinning robot refereed the game.*
23 *Plenty of people sat around ogling and drinking.*

1 *Warwick looked up, past the floodlights to the orange metal sheets and green*
2 *fungus. Deep under the scent of sweet sugar and freshly baked dough, he could still detect the*
3 *stink of metallic rot, damp dog, death and decay and worst of all, the toxic smog, lingering far*
4 *below.*

5
6 *As they approached an opening, looking out over empty space, an iron mesh rail*
7 *lined the walkways. A mural of a lush green park was painted onto one of the steel walls which*
8 *the railings were attached to. A graffiti sign suspended from an overhead cable said “NYC*
9 *central park this way” with a green boil infected finger pointing down over the rail into the*
10 *smog.*

11
12 *Warwick walked over to the rail, peering over the void. A network of wires and*
13 *rods spread into the darkness ahead and into the smog below. Massive steel bolstering beams*
14 *rose from the darkness, pushing against the giant towers.*

15 *‘I wonder what it was like down there in Central Park before the fall,’ said Jade*
16 *standing next to Warwick and placing her hand next to his on the rail.*

17
18 *He looked down at her delicate hand as her little finger brushed his.*

19 *‘I was wondering how fragile the bolstering beams look, like delicate little*
20 *fingers, so easy to snap. If one of them beams broke, it probably wouldn’t be disastrous, but if a*
21 *few of them brake in close proximity, the house of cards comes tumbling down,’ said Warwick,*
22 *holding up Jade’s little finger and pretending to snap it.*

23
24 *‘Like dominos,’ said Jade yanking away her hand and giggling.*

1 *'No like a house of cards,' said Warwick.*

2 *'Same difference.'*

3 *'How can a difference be the same, and what do you know about dominos,' said*
4 *Warwick.*

5 *'I know old-world stuff too you know; I know all about dominos, they still play*
6 *dominos in the dark passages of the Harlem area.'*

7 *'So, you visit the Needles District do you,' asked Warwick, leaning his back*
8 *against the rail.*

9 *'No not often, my friends told me so. Anyhow, Let's move on,' said Jade, grasping*
10 *Warwick's hand and pulling him off the rail.*

11 *Warwick examined the buildings and people as they walked. Of all the areas in*
12 *New Kowloon, he hated Tetris the most. He hated it because people pretended to be happy, they*
13 *pretended that it would all be ok in the end. They used drugs and alcohol to pretend, not to cope,*
14 *as he did. They used sugar and bright lights and music to mask the real world, they purposely*
15 *deluded themselves. To Warwick, this was delusional paradise trapped between the crumbling*
16 *metallic walls of hell in the sky.'*

Comparison, Conclusion, and Legal Argument- Exhibit G: House of Cards

Comparison Between Arcane and Bloodborg

Both Arcane and Bloodborg utilize a House of Cards metaphor to convey veiled threats through dramatic irony.

In Arcane, Silco builds a house of cards while speaking with Marcus about Vi, using the structure as a metaphor for fragile control. Silco deliberately knocks down the tower while feigning an accident, symbolizing Marcus's vulnerability. The dramatic irony comes from Ren's innocence- she does not understand the threat, but Marcus and the audience do.

In Bloodborg, the House of Cards metaphor is woven into a conversation between Warwick and Jade. Warwick, still assessing Jade's true intentions, likens the city's structural fragility to a house of cards, demonstrating how an entire system can collapse if a few key pieces fail. The metaphor is reinforced by Warwick playfully pretending to snap Jade's little finger- subtly warning of power dynamics and the consequences of instability.

Both scenes serve as indirect threats masked within casual conversation. The implications are clear to the characters involved, but only the audience understands the full weight of the warning- making the metaphor a powerful narrative tool.

Conclusion

The parallels between Arcane and Bloodborg are striking, not only in the use of the House of Cards motif but also in how the scene is framed. In both, a dominant figure (Silco/Warwick) subtly warns a subordinate or someone they are trying to control (Marcus/Jade). The metaphor of fragile structures- whether a literal card tower or a city's crumbling infrastructure- carries the same thematic weight and serves the same narrative function.

Given the sheer number of alleged similarities between Arcane and Bloodborg, this is not an isolated case of common storytelling techniques. Instead, it suggests a pattern of deliberate adaptation and re-contextualization of Bloodborg's copyrighted material.

1 **Legal Argument**

2 Substantial Similarity and Intentional Copying

3
4 Courts determine copyright infringement by evaluating whether two works share
5 substantial similarities in protectable elements. The House of Cards metaphor, as used in
6 Bloodborg, is not merely a generic trope but is specifically tied to character dynamics, narrative
7 tension, and dramatic irony in a way that is mirrored in Arcane.
8

9 The visual and thematic execution of the scene in Arcane strongly suggests it was
10 taken directly from Bloodborg, especially considering the context in which it appears.
11

12
13 Access and Derivative Work Claims

14 If Riot Games had access to Bloodborg, even if indirect, and used key scenes, this
15 would strengthen claims of unauthorized derivative work.
16

17 Courts have recognized that the presence of multiple similarities- especially in
18 highly specific execution rather than broad themes- can indicate copying rather than independent
19 creation.
20

21 Gaslighting and Plausible Deniability as a Legal Tactic

22 The deliberate insertion of key elements from Bloodborg, disguised within
23 Arcane, follows a common strategy in intellectual property infringement cases. By making subtle
24

1 changes (e.g., using a literal house of cards instead of a structural metaphor), Riot Games could
2 attempt to argue that these similarities are mere coincidence.

3 However, the cumulative weight of identical motifs, character dynamics, and
4 thematic execution suggests a deliberate misappropriation of creative content.
5

6 7 **Final Takeaway**

8 The House of Cards scene in Arcane is highly suspect as an original creation,
9 given its deep structural and thematic ties to Bloodborg. This strengthens the case for copyright
10 infringement, showing that Riot Games may have knowingly incorporated key elements of
11 Bloodborg while disguising them just enough to avoid overt detection. This falls under
12 substantial similarity and intentional adaptation, reinforcing the legal claim against Riot Games.
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**Possible evidence of use of an AI writing tool to convert Bloodborg into
Arcane.**

As almost all scenes in Arcane have a direct overlap of Bloodborg, with almost all of the scenes reviewed from the first 6 episodes, seemingly being reworked copies of those of Bloodborg, forced into Arcane, the Plaintiff is suspicious that perhaps an AI writing tool was used to tease out the core and meaning of Bloodborg's scenes whilst posing as original. This would explain why written subliminary visuals, aesthetics, dialogue, features and details in Bloodborg appear in Arcane, just a little differently, but without in depth substance, or understanding by the "Showrunners." The two showrunners don't seem to understand what Arcane is, as evidenced in multiple interviews and by Amanda Overton's comments during Bridging the Rift, when she had to tell the so called "Writers" the core of the story. This is also confirmed by Melinda Rediger who states in podcasts that she had to teach Linke and Yee the very basics of developing a character.

Evidence of use of an AI writing tool

Such as,

- 1, Eye Iconography
- 2, The Purple Eye
- 3, The Trauma
- 4, The Bridge (Dead parents) scene
- 5, The House of Cards.

Exhibit H- Hexcore Responds to Organic Matter.

In this scene we see Jayce and Viktor experimenting with the Hexcore.

Viktor says, *“It responds to organic Matter. This is unlike anything we have ever seen Jayce. It could be the key to augmenting physiology, extending life.”*

Jayce adds, *“Curing illness.”*



The Plant then dies. **Viktor says,** *“It has happened to every one, I can’t determine why. They are rejecting the transmutation.”*



1 **Hexcore Responds to Organic Matter: A Comparison with Bloodborg's**
2 **Thematic and Scientific Concepts**

3 This scene in Arcane where Jayce and Viktor experiment with the Hexcore-
4 discovering its ability to interact with organic matter, and its potential applications in augmenting
5 physiology, curing illness, and extending life- bears striking similarities to fundamental themes
6 in Bloodborg. This exhibit details these parallels, demonstrating that the conceptual and narrative
7 execution of these ideas in Arcane appears derived from Bloodborg.
8

9
10 **Comparison Between Arcane and Bloodborg**

11 1. The Hexcore's Interaction with Organic Matter vs. The Blood Technology in
12 Bloodborg

13 **In Arcane**, the Hexcore is an experimental device that responds to organic matter,
14 but struggles with the transmutation process- causing organic material to deteriorate instead of
15 being augmented. This is identical to the scientific process explored in Bloodborg, where
16 augmentation of physiology through bio-chemical and blood-based experimentation is central to
17 the story.
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Quotes from Bloodborg:

In Bloodborg, the very same concept is explored both metaphorically and explicitly.

1, *“The Founding Families, supposedly, with the help of their higher consciousness buddies, have found the Elixir of Life, a cure-all potion... What I do know is, they are farming us. We are a stockpile of fresh blood to them. The Founding Families and others inside the Inner Assemblage have blood on the menu.”*

“The Founding Families are moving towards a world without resistance, a one-world slave machine where the only survivors see them as gods. They plan to re-house their minds in bloodborgs, the pinnacle of all creation. The ultimate cybernetic human beings. Merging AI, in-brain, robotics and synthetic human self-regenerating tissue with the perfect cocktail of endless blood to be immune to all diseases and ageing.”

2, *“Despite the problems and the warnings, the Super-rich relentlessly continued building their skyscrapers up, reaching far above the clouds, like stems of plants emerging from the soil, stretching up, competing for sunlight. The ground level smog became unbearable. It lingered at its mistiest around head height, choking thousands of poverty-stricken people to death.”*

1 3, "... I shall call it, if I survive and manage to get it viral on Descartes's Deep-
2 Root. Descartes's Deep-Root is a kind of illegal interconnected thinking and sharing space
3 which is thought to have developed naturally after the mass extinction, Gaia's cleansing. People
4 still think and share freely in Deep-Root, apparently there is much of the Old-World stuff to
5 hack. It's very hard to access, people say it has something to do with the Pineal gland. To gain
6 access, one must meditate for hours after taking the correct preparation drink, made from the
7 roots of an old tree, thought to be extinct now, thus the concoction is in short supply and
8 extremely expensive.

9
10 I might as well admit it now, I've accessed Deep-Root, mostly to read of the Old-
11 World. The Concoction (Rescogita) is more available in the 4th quarter because the mountains
12 are harder to search."
13

14
15 **Key Similarities:**

16 Both Arcane and Bloodborg explore organic augmentation as a means to extend
17 life and cure illness.
18

19 Both works depict a struggle in stabilizing the augmentation process, leading to
20 repeated failures and unintended consequences.
21

22 The Hexcore's mysterious energy resembles the bio-chemical properties of blood
23 in Bloodborg, which is a foundation for bodily enhancements and intelligence-based biological
24 warfare.

The Scientific and Ethical Dilemma: Playing God

In both Arcane and Bloodborg, the ability to alter human physiology through scientific experimentation creates an ethical dilemma. Viktor in Arcane mirrors the ethical and existential struggle faced by the scientists in Bloodborg, as both stories examine the consequences of tampering with the natural order.

Arcane:

The Hexcore presents the promise of unlimited potential, but also the danger of irreversible consequences.

Viktor sees it as a cure to his degenerative disease, but it rejects the organic matter, indicating that the process is flawed and unstable.

Bloodborg:

The Founding Families develop blood-based augmentation for intelligence and bodily evolution, but the cost is human lives used for harvesting blood and testing mutations.

Scientists attempt to engineer an improved species, but the mutations spiral out of control, much like how the Hexcore rejects its subjects in Arcane.

The world of Bloodborg also delves into transhumanism, blending AI, nanotech, and blood technology-very similar to how Viktor ultimately integrates with the Hexcore.

**Legal Argument: The Uncanny Resemblance Between Arcane’s Hexcore Arc
and Bloodborg’s Core Scientific Premise**

Given the extreme narrative, thematic, and even scientific similarities between Arcane and Bloodborg, it is highly unlikely that these parallels occurred independently. Courts analyzing copyright infringement cases look at substantial similarity, particularly when unique elements of a prior work appear in the accused work in a slightly altered yet clearly derived form.

Legal Precedents & Key Arguments

Access & Influence: Arcane’s showrunners had direct access to Bloodborg before significant aspects of the show’s script were finalized.

Substantial Similarity Test: Courts apply a two-prong approach: (1) Extrinsic Test (objective similarities in themes, settings, and structure) and (2) Intrinsic Test (the subjective feel of both works). Bloodborg and Arcane are overwhelmingly similar in their depiction of augmentation failures, scientific ethics, and bio-alchemical evolution.

Deliberate Modifications to Mask Originality: Altering the mechanics of how augmentation works (switching Bloodborg’s blood-based augmentation with Arcane’s Hexcore-based transmutation) does not negate the clear narrative blueprint taken from Bloodborg.

1 Pattern of Infringement: This is one of countless parallels between Arcane and
2 Bloodborg. The repeated occurrence of nearly identical concepts suggests a deliberate adaptation
3 rather than an accidental similarity.
4

5
6 **Conclusion:** Another Key Instance of Infringement in Arcane

7 This exhibit further strengthens the argument that Arcane is not independently
8 created, but rather a reworked version of Bloodborg, where thematic and scientific components
9 have been altered slightly but retain the same core essence. The failure of augmentation in
10 Arcane follows the exact trajectory seen in Bloodborg, where scientific progress meets the
11 inevitable rejection of unnatural transmutation.
12

13
14 This exhibit further justifies that Riot Games must be held accountable for
15 unauthorized adaptation and derivative use of the copyrighted work Bloodborg.
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Exhibit I- Inside the Rune vs inside Deep-Root.

The concept of the mind travelling inside this higher realm is almost identical in
Arcane and Bloodborg.

In episode 6, we have seen both Viktor and Heimerdinger glimpse inside the
Rune.



1 The rune is visually a spreading root like organism inside the higher
2 consciousness. The science of this is not explained or explored in Arcane.
3

4
5 **In Bloodborg**, Deep-Root is a connected higher realm of consciousness. It is
6 outside of our 4 dimensions, three spatial dimensions and one temporal dimension, yet it is
7 accessed via our 5th dimension of consciousness. Thus, opened consciousness is the gateway,
8 made possible by Mother Gaia herself, contacting humans. This is exploited by the Founding
9 Families and others.
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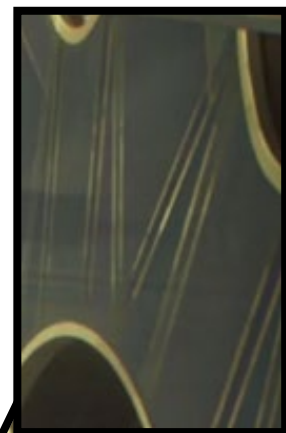
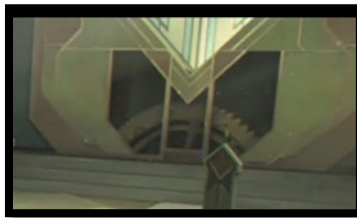
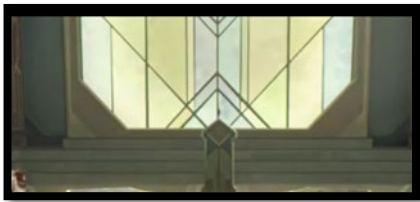
Conclusion – Exhibit I: Inside the Rune vs. Inside Deep-Root

The concept of entering a higher realm of consciousness is strikingly similar between Arcane and Bloodborg. In Arcane, the Rune represents an abstract, root-like entity inside a higher state of being, while in Bloodborg, Deep-Root is a scientifically and philosophically developed higher realm, accessed through expanded consciousness and manipulated by powerful elites.

While Arcane presents this concept in a visually symbolic and unexplored manner, Bloodborg delves deeply into its scientific, theoretical, and spiritual implications- connecting consciousness, quantum mechanics, and the exploitation of higher knowledge. The lack of explanation in Arcane suggests that the concept may have been borrowed and superficially implemented, rather than being an original, fully developed idea.

This recurring pattern of abstraction without depth strongly supports the argument that Arcane adapted key Bloodborg elements without fully understanding or developing them, further reinforcing the case for unauthorized derivative use.

Exhibit J- More not so hidden M.W.'s



92

PLAINTIFF'S EXHIBIT X- DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 6: SUPPORTING
EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE



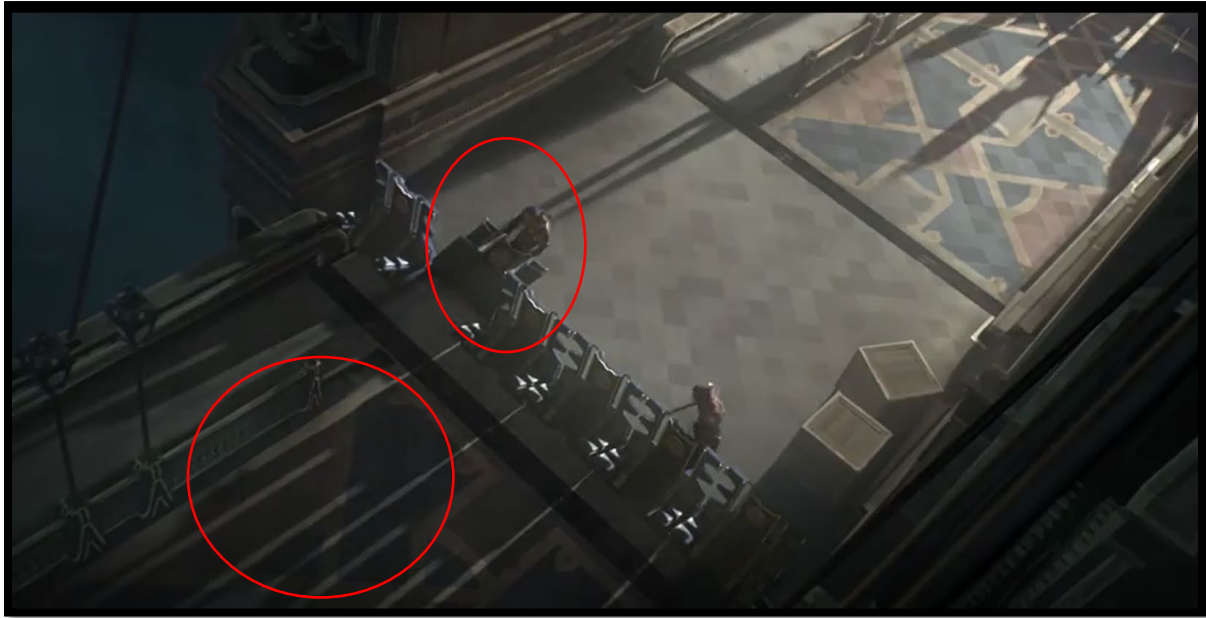
Three lights on each side make M and W and the center light of each side
shines on an M on the left and W on the right side.



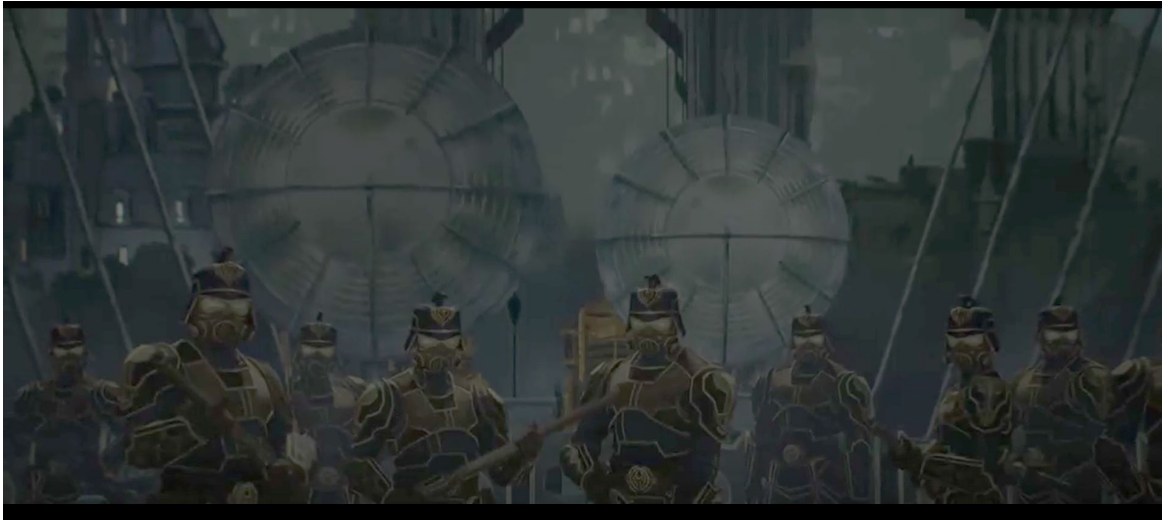
W- Blue Smoke as the Center Symbolizing W lighting the way.



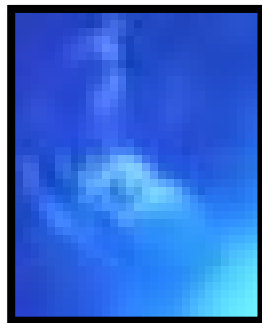
M, flipped to W – Marking the beginning of War



W in the shape of the famed image, behind the Enforcers.







These M and W's are not accidental; they are deliberate design features.

Exhibit K- Rio being Milked for his Blood.

In this scene we see the next step in blood engineering, which is the same in both works. Rio is being milked for his mutated blood, which is the same in Bloodborg and has been covered many times over. Rio, via the Shimmer flowers and his mutations, are being kept alive far beyond normal life expectancy.



1 Here we see Viktor, now grown into a man, re-visits Singed, the Doctor, who is
2 now singed, and we see Reo still alive and evolved, sedated in a tank.
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Exhibit L-Gaslighting traps.

In this image the use of spikes, deliberately marked that way is an example of a trap, in which is calculatingly set to make the victim point it out, to make him sound “Mad” to cause doubt in the Jude or jury.

The difference in this image is that the spikes which make M and W are not out of the ordinary and have not been layered or masked. Except the tiny one in the upper right part of the image, which is out of normal expectation as it sits alone. The Plaintiff will explain his know-how in a separate document.

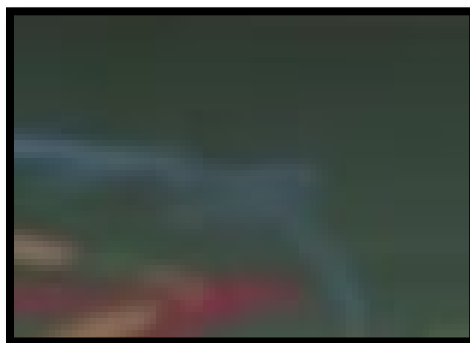
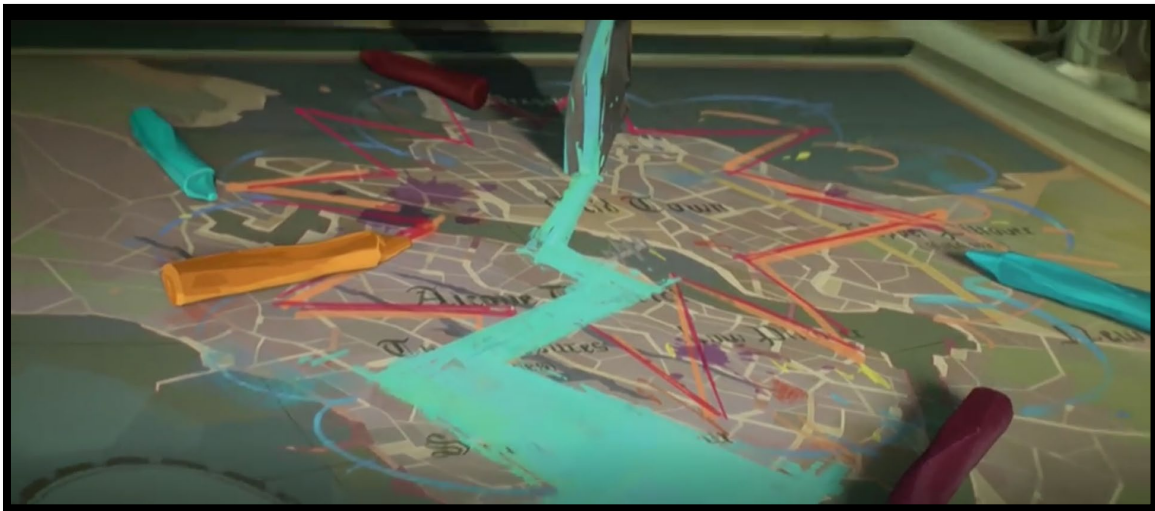


Exhibit M- More Jack Pods

“A white floating Jack pod broke off its electrical connections to the people and batteries it was charging. The ball Jack pod whizzed over and blast white light into Rook’s eyes. The burning white outlasted for a painful second.”



Exhibit N- Sister Reunion

When Vi and Jinx meet, right after Jinx let's off the blue smoke, Jinx says,
“Things changed when you left... I changed.”

Vi replies, “You did what you had to to survive, me too, it's ok.”



In Bloodborg, Jade says to Warwick,

*“I don't question your reasons, I just silently understand and I do not judge you, I
would never judge you for the things you have to do to survive in this messed-up city,”*

Conclusion - Exhibit N: Sister Reunion

The emotional weight of two characters reuniting or bonding after a long separation or a long personal struggle, each having undergone drastic personal change for survival, is a central narrative theme in both Arcane and Bloodborg.

In Arcane, Jinx expresses how she has changed due to abandonment and survival pressures, while Vi immediately offers unconditional understanding, acknowledging that both have done what was necessary to endure. Similarly, in Bloodborg, Jade reassures Warwick that she does not judge him for his actions, demonstrating the same unconditional empathy and recognition of survivalist necessity.

The phrasing, tone, and emotional core of both exchanges are nearly identical, reinforcing the argument that Arcane not only adapted plot structures from Bloodborg but also borrowed deeply personal character interactions, repurposing them into its own narrative. The lack of originality in these defining moments supports the claim of derivative copying rather than independent creation.

Exhibit O- Mutilated Mylo's Penis

In the end scene of this episode, we see Jinx's hallucinations of Mylo.

He has no eyes; this can be explained away by the fact that he is dead. However, the fact that dead Mylo has his penis out further confirms that the Arcane creators hid details in the scenes. This isn't an accident; you can clearly see that the penis had a pink bellend (The glans).



Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Marc Wolstenholme

Plaintiff, Pro Se

Dated: March 04th, 2025

M. WOLSTENHOLME